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Donjon Marine Co., Inc.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
KRISTOPHER LATORRE

Civil Action No.: 11-cv-1764 (JBW) (JMA)

Plaintiff,

-against-

**PROPOSED CASE MANAGEMENT PLAN
AND SCHEDULING ORDER**

DONJON MARINE CO., INC.,

Defendant.

Pursuant to Fed. R. Civ. P. 16 and 26, the parties submit a proposed Case Management Plan and Scheduling Order in this action:

1. Rule 26(a)1 Initial Disclosures shall be served by June 29, 2012;
2. Initial requests for production of documents to be served by July 12, 2012;
3. Initial interrogatories are to be served by July 12, 2012;
4. Additional parties to be joined by August 31, 2012;
5. Amended Pleadings to be filed by August 31, 2012;
6. A status conference is scheduled on _____;
7. All fact discovery is to be completed by February 1, 2013;
8. All *expert* disclosures are to be served as follows:

- a. Plaintiff's expert disclosures on or before January 18, 2013;
 - b. Defendant's expert disclosures on or before February 15, 2013;
9. All expert depositions shall be completed by March 15, 2013;
10. Dispositive motions shall be filed by March 29, 2013; and
11. The parties shall submit a Joint Pretrial Order by April 5, 2013.

Dated: June ,2012
New York, New York

SO ORDERED:

U.S.M.J.